

Remarks

1. Summary of the Final Office Action

In the Final Office Action mailed January 6, 2009, the Examiner rejected claims 1-3, 5, 7-10, 14-16, 18-20, 35-37, 58, 60-65, and 69-75 under 35 U.S.C § 102(e) as allegedly being anticipated by U.S. Patent Application Pub. No. 2001/0046366 (Susskind). The Examiner also rejected claim 6 under 35 U.S.C § 103(a) as allegedly being unpatentable over Susskind in view of U.S. Patent No. 7,124,356 (Alsafadi), and rejected claims 11-13, and 66-68 under 35 U.S.C § 103(a) as allegedly being unpatentable over Susskind in view of U.S. Patent Application Pub. No. 2007/0240181 (Eldering).

2. Status of the Claims

Presently pending are claims 1-3, 5-16, 18-20, 35-37, 58, and 60-75, of which claims 1, 35, 58, and 60 are independent, and the remainder are dependent. Applicants have amended various claims as follows.

Applicants have amended each of claims 1, 35, 58, and 60 to recite, in one way or another, that the plurality of web portals includes a “first web portal” and a “second web portal,” and that the API connects each of the plurality of web portals with the at least one database. Applicants have also amended each of claims 1, 35, 58, and 60 to recite, in one way or another, both first and second instances of users, and/or client devices, and/or requests, and/or media-based devices, and/or formats used by web portals for exchanging data with a database via the API, and/or data concerning media-based devices, in addition to the first and second web portals noted. Additionally, the first and second formats are specified as being different. These amendments more clearly specify the one-to-many relationship between the API and the plurality of web portals. Other amendments to these claims introduce clarifying language. Support for

these amendments can be found generally throughout the original specification at specifically at least in paragraphs 9, 11, 15, 16, 102, 161, 162, and 164.

Applicants have also amended various dependent claims so as to ensure consistency of antecedent basis with their respective base claims.

No new matter has been added by way of any of the above amendments.

Applicants note that they filed an After Final Response to the present Final Office Action on February 27, 2009. In a subsequent Advisory Action mailed March 18, 2009, the Examiner indicated that amendments included in the After Final Response would not be entered. Following receipt of the Advisory Action, the present response is now being filed in conjunction with a Request for Continued Examination (RCE). The claim amendments in the present response (summarized above) are cumulative with respect to the amendments made in Applicants' After Final Response filed on February 27, 2009. That is, the claim amendments in the present response have been made to the amended claims of the After Final Response, as if the claim amendments of the After Final Response *had* been entered.

3. Response to Rejections under 35 U.S.C. § 102(e)

The Examiner rejected claims 1-3, 5, 7-10, 14-16, 18-20, 35-37, 58, 60-65, and 69-75 under 35 U.S.C § 102(e) as allegedly being anticipated by Susskind. Under M.P.E.P. § 2131, a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. Applicants submit that Susskind fails to teach each and every element set forth in any of claims 1-3, 5-16, 18-20, 35-37, 58, 60-65, or 69-75. Applicants first direct their discussion to claim 1, and then subsequently address claims 2-3, 5-16, 18-20, 35-37, 58, 60-65, and 69-75.

Susskind does not teach or suggest:

“implementing in the server an Application Program Interface (API) that connects each of the plurality of web portals with at least one database concerning media-based devices, and that fits data retrieved from the at least one database to a format associated with the each of the plurality of web portals,”

and

“at the server, receiving a first request relating to a first media-based device from a first user at a first client device via the first web portal, the first web portal using a first format for exchanging data with the at least one database via the API,”

and

“at the server, receiving a second request relating to a second media-based device from a second user at a second client device via the second web portal, the second web portal using a second format for exchanging data with the at least one database via the API, wherein the second format is different from the first format.”

As Applicants summarized in a previously-filed response, Susskind discloses a system for controlling operation of a remotely located video recording device includes at least one Video Recording Device connected to the Internet; at least one Internet access device connected to the Internet; and at least one Internet Remote Control Server connected to the Internet, whereby the Internet access device can control the Video Recording Device. In particular, Susskind teaches (paragraph [0035]) that the Internet access device communicates with an “Internet Web Site Host” that provides HTML pages that simulate the Video Recording Device. Susskind further teaches (paragraph [0036]) that the Internet Remote Control Server provides information to the Internet Web Site Host.

To the extent that the Internet Remote Control Server disclosed in connection with Figure 2 and as described in paragraph [0035] of Susskind could be considered as functionally analogous to the server recited in claim 1, and that the Internet Web Site Host also disclosed in connection with Figure 2 and also as described in paragraph [0035] of Susskind could be considered as functionally analogous to one of the web portals recited in claim 1, Susskind does

not teach that the Internet Remote Control Server connects to a plurality Internet Web Site Hosts. In particular Susskind does not teach that the Internet Remote Control Server connects to different Internet Web Site Hosts that use different formats for exchanging data with a database via the Internet Remote Control Server. Rather, Susskind teaches that the Internet Remote Control Server connects to only one Internet Web Site Host.

While the system disclosed in Susskind might allow a two users at different Internet Web Access Devices to connect to the Internet Remote Control Server via a single Internet Web Site Host, Susskind clearly does not teach or suggest a first user connecting to the Internet Remote Control Server via a first Internet Web Site Host and a second user connecting to the Internet Remote Control Server via a second Internet Web Site Host. Moreover, Susskind cannot teach that different Internet Web Site Hosts use different formats for exchanging data with a database via the Internet Remote Control Server, because Susskind fails to teach more than one Internet Web Site Host connected to the Internet Remote Control Server. In other words, Susskind teaches a one-to-one relationship between the Internet Remote Control Server and the Internet Web Site Host.

In contrast, claim 1 not only expressly recites “implementing in the server an Application Program Interface (API) that connects each of the plurality of web portals with at least one database concerning media-based devices, and that fits data retrieved from the at least one database to a format associated with the each of the plurality of web portals,” but claim 1 also recites, in one way or another, that the server receives first and second requests from first and second users, respectively, via first and second web portals, respectively, wherein the first and second web portals use different formats for exchanging data with a database via the API. Applicants submit that one of ordinary skill in the art would understand the purpose and

functional elements of the API, and could readily interpret the API recited in claim 1 in the context of the specification, particularly in view of the detailed description presented at least in paragraphs 102 and 161-164, for example. Since the API is implemented in the server, and the different requests are received via different web portals using different formats, this limitation of claim 1 describes a one-to-many connection between the server and the plurality of web portals that clearly distinguishes over the one-to-one relationship between the Internet Remote Control Server and the Internet Web Site Host taught by Susskind. Applicants submit that for at least this reason, claim 1 distinguishes over Susskind, and is therefore allowable.

Each of independent claims 35, 58, and 60 include, *inter alia*, elements similar to the limitation of claim 1 discussed in the preceding paragraphs herein. In addition, claims 35 and 58 recite, in one way or another, that data are fitted to the different formats of the first and second web portals, and claim 60 recites, in one way or another, that data are transmitted in different formats to the first and second web portals. Applicants submit therefore that claims 35, 58, and 60 also distinguish over Susskind, and are allowable as well.

Each of claims 2-3, 5, 7-10, 14-16, 18-20, 36-37, 60-65, and 69-75 depend, in one way or another, from one of claims 1, 35, or 60, all of which are allowable for at least the reasons discussed above. Applicants submit that for at least the reason that they depend from an allowable claim, claims 2-3, 5, 7-10, 14-16, 18-20, 36-37, 60-65, and 69-75 are allowable as well. Further, Applicants do not concede any of the Examiner's specific assertions with respect to claim 2-3, 5, 7-10, 14-16, 18-20, 36-37, 60-65, and 69-75.

4. Response to Rejections under 35 U.S.C. § 103(a)

Each of claims 6, 11-13, and 66-68 depends, in one way or another, from one independent claim 1 or 60, both of which are allowable for at least the reasons discussed above.

Applicants submit that for at least the reason that they depend from an allowable claim, claims 6, 11-13, and 66-68 are allowable as well. Further, Applicants do not concede any of the Examiner's specific assertions with respect to claim 6, 11-13, and 66-68.

5. Conclusion

Applicants submit that the application is in good and proper form for allowance and therefore respectfully request favorable reconsideration. If, in the opinion of the Examiner, a telephone conference would expedite the prosecution of this application, the Examiner is invited to call the undersigned at 312-913-3353.

Respectfully submitted,

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